

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

YEKEEN A. BELLO

Plaintiff

V.

Civil No.: AMD-03-CV-493

BANK OF AMERICA CORPORATION

Defendant.

**AFFIDAVIT IN SUPPORT OF PLAINTIFF’S MOTION TO EXTEND
DISCOVERY AND RELATED DEADLINES**

I, Fatai A. Suleman, declare as follows:

1. I am the attorney representing the Plaintiff, Yekeen A. Bello, in this case. The facts in this Declaration are based on my personal knowledge.
2. That I am the only attorney of record for the Plaintiff. Because of time demands of other matters and because the discovery period fell within my vacation time, I was not able to propound Plaintiff's discovery requests to Defendant until September 8, 2003.
3. The Defendant responded to Plaintiff's discovery request on October 8, 2003, and I received Defendant's response on or about October 10, 2003.
4. The Defendant in its discovery responses, objected to responding to certain discovery requests Plaintiff deemed to be relevant to his case and as a result the extension of time is needed to properly resolve all the outstanding issues with the Defendant's responses.

5. In addition, upon reviewing Defendant's discovery responses, I discovered that I need to conduct further discovery for the Plaintiff in order to be fully prepared for this action. The needed discovery included the scheduling of deposition of Defendant's witnesses.

6. That I believe a short extension of thirty days is required by Plaintiff to fully complete discovery in this matter.

7. That there has not been any previous extension or amendment of the Scheduling Order in this action; that Plaintiff's motion for extension of time is not in bad faith but made for the purpose of performing complete discovery, and that Defendant will not be prejudiced by the extension, if granted.

I declare under a penalty of perjury that the foregoing is true and correct.

Executed this 15th day of October 2003.

Fatai A. Suleman